

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE**

TRACY TURNER,)	
)	
Plaintiff,)	
)	
v.)	CIVIL No. 3:21-CV-00042
THE METROPOLITAN)	District Judge Eli Richardson
GOVERNMENT OF)	Magistrate Judge Newbern
NASHVILLE AND DAVIDSON)	
COUNTY, TENNESSEE,)	
)	
Defendant.)	

PLAINTIFF’S MOTION FOR ATTORNEYS’ FEES, COSTS, AND EXPENSES

As the prevailing party in this litigation and pursuant to 42 U.S.C. § 1988 and Local Rule 54.01, Plaintiff Tracy Turner (“Turner”) respectfully moves the Court to award him reasonable attorneys’ fees, costs, and expenses.

The attorneys’ fees requested by Turner through the date of this filing total \$216,318.32. The amount of costs and expenses to be reimbursed total \$7,080.00, as reflected in the Bill of Costs. As demonstrated in the supporting Memorandum, Affidavits and Declarations of Larry L. Crain, Emily Castro, and Edward Yarbrough, and the accompanying contemporaneous time records, incorporated by reference, the amounts requested are reasonable and justified by established law. Turner reserves the right to seek additional fees in the event a reply brief, hearing, other post-judgment motions, appeal, or other compensable work becomes necessary in order to obtain a full, reasonable fee award for the work performed in this matter.

Respectfully submitted,

/s/ Larry L. Crain

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CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of February, 2025 a true and exact copy of the foregoing Plaintiff's Motion for Attorneys' Fees, Costs, and Expenses has been served upon the person(s) listed below via the court's ECF filing system:

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/s/ Larry L. Crain

Larry L. Crain